

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

In Re:	Bankruptcy No. 18-20259-GLT
Theodore Ansell, Debtor(s)	
KeyBank NA, as S/B/M to First Niagara Bank, NA, Movant(s)	Chapter 13
v. Theodore Ansell, and Ronda J. Winnecour, Trustee Respondent(s)	Related to Claim # 4

DECLARATION THAT EXISTING CHAPTER 13 PLAN IS SUFFICIENT TO
FUND THE PLAN WITH THE MODIFIED DEBT

1. KeyBank NA, as S/B/M to First Niagara Bank, NA filed a Notice of Mortgage Payment Change on July 23, 2018.
2. Debtor's current escrow account payment remains unchanged.
3. Debtor's principal and interest payment remains unchanged
4. Debtor's Current total payment is \$147.65 per month
5. Debtor's new total payment is \$149.04 per month.
6. Debtor believes and avers that the current confirmed plan is sufficient without the need for amendment.

Date: July 23, 2018

/s/ Corey J. Sacca
Corey J. Sacca, Esq.
PA ID # 306741
Bononi & Company, P.C.
20 North Pennsylvania Ave, Suite 201
Greensburg, PA 15601
(724) 832-2499
csacca@bononilaw.com